

The Honorable Paul B. Snyder
Chapter 11
Hearing Date: December 18, 2008
Hearing Time: 9:00 a.m.
Hearing Location: Tacoma, WA
Response Date: December 11, 2008

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In re

STEPHEN J. HUEFFED and
AMY D. TURNBULL,

Debtors.

No. 08-46005-PBS

DECLARATION OF SHELLY CROCKER
IN SUPPORT OF APPLICATION TO
EMPLOY CROCKER KUNO PLLC AS
DEBTORS' COUNSEL

Shelly Crocker declares as follows:

1. I am an attorney admitted to practice before this Court and am a member of the law firm of Crocker Kuno PLLC ("Crocker Kuno"). I am one of the attorneys representing Stephen J. Hueffed and Amy D. Turnbull, the debtors-in-possession in this Chapter 11 case ("Debtors"). I have personal knowledge of the facts stated in this Declaration and am competent to testify to them.

2. I have undertaken an investigation of any connections that may exist between Crocker Kuno and the Debtors, the creditors of Debtors, other known parties in

DECLARATION OF SHELLY CROCKER IN SUPPORT OF APPLICATION
TO EMPLOY CROCKER KUNO PLLC AS DEBTORS' COUNSEL - 1

CROCKER KUNO PLLC

720 Olive Way, Suite 1000
Seattle, WA 98101 - 1853
P) 206-624-9894
F) 206-624-8598

1 interest in this case, and their respective attorneys and accountants. To the best of my
2
3 knowledge, there are no such connections.
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5 3. Copies of the Engagement Letters are attached as **Exhibits A and B** to
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7 this Declaration.
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10 4. Mr. Hueffed and Ms. Turnbull gave Crocker Kuno an initial security
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12 retainer for pre-petition work of \$17,302.00, which includes the \$1,039 Chapter 11 filing
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14 fees. Five thousand dollars of the retainer was provided in April 2008 and the remaining
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16 \$12,302.00 was provided just prior to filing. At the time of filing, the trust account has a
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18 balance of \$1,079.00. The remaining retainer provided by Mr. Hueffed and Ms. Turnbull
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20 covers both this Chapter 11 case and the Chapter 11 case of La Ferme de Metras, LLC,
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22 case number 08-46005.
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25 5. Crocker Kuno will seek, and expects Debtors to support, the payment of
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27 Crocker Kuno's allowed fees and costs incurred in prosecuting the Chapter 11 case.
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30 6. Crocker Kuno will seek compensation from the bankruptcy estate under
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32 §§ 330 and 331 of the United States Bankruptcy Code.
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35 7. Crocker Kuno has not shared or agreed to share compensation with any
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37 other entity.
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40 8. To the best of my knowledge, Crocker Kuno does not hold or represent
41
42 any interest adverse to Debtors or the bankruptcy estates in the matters for which Crocker
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44 Kuno is to be engaged. I believe Crocker Kuno is a "disinterested person" for purposes
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46 of §§ 101(13), 327(c) and 1107(b) of the United States Bankruptcy Code.
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1 9. I have reviewed and am familiar with Local Bankruptcy Rule 2016.
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3 Under penalty of perjury, I declare I have read this statement and to the best of
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5 my knowledge believe it is true.
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7 DATED this 24th day of November 2008.
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12 /s/ Shelly Crocker
13 Shelly Crocker
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